

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES
LLC, MONTGOMERY TECHNOLOGIES
LLC, VIRGIL QUANTITATIVE
RESEARCH, LLC, VIRGIL CAPITAL LLC,
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (JGLC)

**NOTICE OF RECEIVER'S MOTION
TO COMPEL TURNOVER OF ASSETS**

PLEASE TAKE NOTICE that Robert A. Musiala, Jr., the Court-appointed Receiver in the above-captioned case ("Receiver"), by and through his undersigned counsel, respectfully moves this Court before the Honorable Jessica G.L. Clarke, United States District Judge for the Southern District of New York, at the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10007, pursuant to paragraphs I.7.A-K and IX.34-35 of the Order Appointing Receiver (ECF No. 31), for the entry of an order granting the Receiver's Motion declaring (i) 20.03 BTC and \$3,000,662.96 worth of digital assets ("Disputed Assets") to be deemed Receivership Property and (ii) directing Nasir Adaya and Phuong Nguyen to turnover the Disputed Assets, or the financial equivalent thereof, to the Receiver, together with such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must: (i) be made in writing; (ii) conform to the Federal Rules of Civil Procedure, the Local Rules for the Southern District of New York, and other applicable rules and guidelines; and (iii) be filed so as to be received by the Court no later than 21 days from the date of this Motion.

PLEASE TAKE FURTHER NOTICE that this Motion is made with the consent of Plaintiff.

Dated: August 4, 2023
New York, New York

BAKER & HOSTETLER LLP

/s/ Marco Molina
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